

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

| | | |
|---------------------------|---|-------------------------------------|
| _____ |) | |
| ANTHONY J. SAMANGO, III, |) | |
| |) | |
| Plaintiff, |) | |
| |) | Civil Action No.2:11-cv-01789-JHS |
| |) | Consolidated with 2:11-cv-00819-JHS |
| v. |) | |
| |) | |
| UNITED STATES OF AMERICA, |) | |
| |) | |
| |) | |
| Defendant. |) | |
| |) | |
| |) | |
| _____ |) | |

MOTION TO FILE AMENDED COMPLAINT

Pursuant to Pennsylvania Rule of Professional Conduct 3.3 and Local Rule 83.6 (Rule IV), and as directed by the Court at the hearing held June 11, 2012, and after consultation with Plaintiff, and based on information provided by Plaintiff, counsel for Plaintiff Anthony J. Samango, III, hereby move to Amend his Complaint in this matter so as to correct those statements in the original Complaint and associated exhibits that counsel have determined must be corrected.¹

¹ The proposed Amended Complaint of Plaintiff Anthony J. Samango, III appears as Exhibit A to this motion.

WHEREFORE, the undersigned counsel respectfully request the entry of an Order directing the Clerk to file the attached Proposed Amended Complaint of Plaintiff Anthony J. Samango, III.

Respectfully submitted,

Dated: June 26, 2012

/s/ Darth M. Newman
Joseph A. Martin (admitted *pro hac vice*)
jmartin@archerlaw.com
Darth M. Newman (PA Bar No. 209448)
dnewman@archerlaw.com
ARCHER & GREINER, P.C.
One Centennial Square
Haddonfield, NJ 08033
Tel. (856) 795-2121
Fax (856) 795-0574

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I, Darth M. Newman, hereby certify that, on June 26, 2012, I caused to be served a true and correct copy of the foregoing Motion to File Amended Complaint on all counsel of record via electronic mail and the Court's CM/ECF system.

/s/ Darth M. Newman
Darth M. Newman